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## BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

Competitive Product Prices Global Plus 1D (CP2016-193) Negotiated Service Agreement Docket No. CP2017-237

## PUBLIC REPRESENTATIVE COMMENTS ON THE POSTAL SERVICE NOTICE OF FILING MODIFICATION TWO TO A GLOBAL PLUS 1D NEGOTIATED SERVICE AGREEMENT

(August 15, 2018)

The Public Representative hereby provides comments pursuant to a Commission notice initiating this docket.<sup>1</sup> In that Notice, the Commission reopens the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service notice of filing Modification Two to a Global Plus 1D Negotiated Service Agreement.<sup>2</sup> The amendment is intended to become effective on September 1, 2018. *Notice* at 1.

The Commission approved the original Global Plus 1D in Order No. 4046<sup>3</sup>, because it (1) was functionally equivalent to the baseline agreement established for the Global Plus 1D product, and (2) satisfied the requirements of 39 U.S.C § 3633 and applicable Commission rules (39 C.F.R. §§ 3015.5 and 3015.7). *Order* at 4.

The Public Representative has reviewed the financial worksheets filed with the instant docket and the other documentation related to the original Global Plus 1D product. Based upon that review, the Public Representative concludes that the requested amendment for the Global Plus 1D Negotiated Service Agreement will

<sup>&</sup>lt;sup>1</sup> Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, August 13, 2018 (Initiating Notice).

<sup>&</sup>lt;sup>2</sup> Notice of United States United States Postal Service of Filing Modification Two To a Global Plus 1D Negotiated Service Agreement, August 10, 2018 (Notice).

<sup>&</sup>lt;sup>3</sup> Order Approving Additional Global Plus 1D Negotiated Service Agreements and Conditionally Approving Modifications, August 16, 2017 (Order No. 4046).

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continue to generate sufficient revenue to cover costs thereby satisfying the requirements of 39 U.S.C. § 3633(a). The Commission will also have an opportunity to review the revenue, cost and volume data for the amended Global Plus 1D product in its upcoming Annual Compliance Determination report.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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